

UNITED STATES GOVERNMENT

# Memorandum

ENVIRONMENTAL PROTECTION AGENCY, REGION IX

TO : Stan Leibowitz

DATE: June 12, 1974

FROM : Adrienne

SUBJECT: Hawaii's Performance in 1) Drafting NPDES Permits,  
2) Certification of EPA Issued Permits, and 3) Forwarding  
Names(s) of Suspected Dischargers. FYI, A List of Other  
Non-Federal Hawaii Applications.

1. Hawaii's Performance in Drafting NPDES Permits

- a. Receipt of NPDES Permits Drafted by Hawaii's Staff (3 per  
month, commencing December 1973)

<u>Date</u>	<u>Application</u>	<u>Application #/NPDES #</u>
December, 1973	No Draft Permits Received	-- --
January, 1974	No Draft Permits Received	-- --
February 7, 1974	C & C Honolulu - Ahuimanu STP	n/a HI0020001
February 7, 1974	County of Maui - Port Allen Outfall	n/a HI0020265
February 7, 1974	Hilo Electric Light Company - Puueo Power Plant	2SN-OY3-2-000146 --
March 15, 1974	County of Maui - Wailuku Outfall	n/a HI0020214
March 15, 1974	County of Maui - Kahului Outfall	n/a HI0020206
March 15, 1974	C & C Honolulu - Kailua Outfall	n/a HI0020141
March 15, 1974	C & C Honolulu - Sand Island Outfall	n/a HI0020117
March 22, 1974	Hilo Water Pollution Control Plant	n/a HI0020176
March 22, 1974	C & C Honolulu - Mililani STP	n/a HI0020061
March 22, 1974	Maui Electric Company, Ltd. (Kahalui)	2SN-OY3-2-000009 --
March 22, 1974	Kauai Electric Company, Ltd. (Port Allen)	2SN-OY3-2-000051 --
April 10, 1974	Hawaiian Electric Company, Honolulu Facility	2SN-OY3-2-000002 --



<u>Date</u>	<u>Application</u>	<u>Application #/NPDES #</u>
April 18, 1974	C & C Honolulu - Kaneohe	n/a HI0020150
April 18, 1974	C & C Honolulu - Pearl City	n/a HI0020133
April 18, 1974	C & C Honolulu - Waipahu Waste Stabilization Pond	n/a HI0020168
May	No Draft Permits Received	-- --

As can be noted from the above chart, Hawaii did not submit draft permits for the months of December, January, and May. The number of submitted draft permits vary from month to month and are not consistent with the commitment of 3 draft permits submitted per month. In addition, 18 draft permits should have been submitted by Hawaii between the period of December, 1973 and May, 1974, but our office has only received 15 draft permits to date.

Comments from the Wastewater Section:

1. Untimely receipt of draft permits from Hawaii result in duplication of effort, since EPA's personnel must draft the same permit to meet Permit Processing Schedule.
2. In one instance, Hawaii did not submit the permits they said they would draft, but submitted draft permits which were already being drafted by EPA personnel. The result was again duplication of effort.

b. General Comments Regarding the Quality of the Draft Permits from the Wastewater Section

1. Hawaii needs more technical guidance in drafting permits.
2. Language used in the draft permits should be revised.

For more specific comments regarding the quality of the draft permits, I suggest you speak to Allan Abramson and his staff. Phil Bobel is Wastewater Section's liaison with Hawaii. Ken Bigos and Bruce Thomson could also provide specific comments.

\*Attached are two permits drafted by Hawaii: Hilo Electric Light Co.  
(Puueo Power Plant)  
2SN-OY3-2-000146  
County of Kauai - Port  
Allen Outfall  
HI0020265

2. Hawaii's Performance in Certification of EPA Issued Permits

\*See Table 1 for Certification of EPA Issued Municipal Permits

\*See Table 2 for Certification of EPA Issued Industrial Permits

No agricultural permits have been issued in Hawaii, therefore there is no Table attached.

Table 1 shows that 6 EPA municipal permits were issued. 5 were given certification within the allotted time. Certification for the County of Maui - Paia Outfall (HI0020192) was waived. Table 2 shows that 34 EPA industrial permits were issued. 23 were given certification within the allotted time. 4 were certified late. Certification for Hawaiian Electric - Kahe Facility (HI0000019) was waived. I cannot determine the timeliness of certification for the remaining 6 permits, since there is no record in the application file.

3. Hawaii's Performance in Forwarding Name(s) of Suspected Dischargers

- a. Only one list of 8 names was forwarded to EPA on May 8, 1974. Honolulu Wood Treating Co. and Yacht Harbor submitted application. Ulehawa Farms sent a letter claiming exemption. No response has been received from Dairy Company, Inc; George Freitas Dairy; State of HI, Division of Transportation; Waialeale Livestock Farm or Hawaii Institute of Marine Biology.

However, in Hawaii's program submittal of May 9, 1974, Hawaii listed the following dischargers of raw sewage:

Moirton Subdivision  
Silverton Subdivision  
Anderton Subdivision  
Paukaa Subdivision  
Ninole Village  
Hakalau Lower Village  
Hakalau Upper Village  
Honolulu Village

but failed to include the above dischargers in their letter of May 8, 1974.

- b. Hawaii did submit Ind & Munic discharger lists with FY74 Program App.*  
4. See Table 3 for the List of Other Non-Federal Hawaii Application.

*Adriane*

Table 1

Certification of EPA Issued Municipal Permits

<u>APPLICANT and APPLICATION #/NPDES #</u>	<u>DATE OF PUBLIC NOTICE</u>	<u>DATE OF CERTIFICATION</u>	<u>LATE DATE OF CERTIFICATION</u>	<u>WAIVER</u>	<u>COMMENTS</u>
✓ C & C Honolulu - Kukanono HI0020044 Issued: April 30, 1974 Expires: Jan. 31, 1979	11-30-73  *Renotice, 02-15-74	12-18-73	--	--	None
✓ C & C Honolulu - Maunawili Park HI0020028 Issued: 02-04-74 Expires: 01-31-79	11-30-73	12-18-73	--	--	None
✓ C & C Honolulu - Waianae HI0020109 Issued: 05-24-74 Expires: 03-31-77	03-29-74	05-07-74	--	--	Certification w/8 other Facilities. Request for Z one of Mix.
✓ County of Kauai - Wailua HI0020257 Issued: 04-03-74 Expires: 01-01-79	01-28-74	02-07-74	--	--	Certify with 7 other Fac. No comments
✓ Hawaii Kai Community Services HI0020303 Issued: 04-03-74 Expires: 01-01-79	01-28-74	02-07-74	--	--	Certify with 7 other Fac. No comments
✓ County of Maui - Paia HI0020192 Issued: 05-20-74 Expires: 03-01-77	02-25-74  *Waiver Letter sent 04-22-74	--	05-07-74	--	04-14-74 rec'd letter request more info before cert.

C & C Honolulu - Maunawili  
Estate  
HI0020036

Table 2

Certification of EPA Issued Industrial Permits

<u>APPLICANT and APPLICATION #/NPDES#</u>	<u>DATE OF PUBLIC NOTICE</u>	<u>DATE OF CERTIFICATION</u>	<u>LATE DATE OF CERTIFICATION</u>	<u>WAIVER</u>	<u>COMMENTS</u>
✓ Hawaii Dept. of Land & Natural Resources Anuenue Fisheries Research Center, Area 4 Sand Island HI0000469 2SN-OY3-2-000065 Issued: 12-31-73 Expires: 12-01-78	11-30-73	12-27-73	--	--	Certified with 1 Other Fac. No Comments
Bumble Bee Seafoods dba Hawaiian Tuna Packers HI0000469 2SN-OY3-2-000065 Issued: 09-28-73 Expires: 06-01-78	07-30-73 *Letter Sent Requesting Cert. 08-21-73	09-17-73		--	Comments re: thermal discharge & chlorine
✓ Carnation Company, Albers Milling Division HI0000531 2SN-OY3-2-000079 Issued: 12-31-73 Expires: 12-01-78	11-30-73	12-27-73	--	--	Certified with 1 other Fac. No Comments
✓ Dole HI0000043 2SN-OY3-2-000004 Issued: 04-05-74 Expires: 01-01-79	01-28-74	02-07-74	--	--	Certified with 7 Other Fac. No Comments. However extensive comments rec'd 10-03-73

<u>APPLICANT and APPLICATION #/NPDES#</u>	<u>DATE OF PUBLIC NOTICE</u>	<u>DATE OF CERTIFICATION</u>	<u>LATE DATE OF CERTIFICATION</u>	<u>WAIVER</u>	<u>COMMENTS</u>
✓ GASCO, Inc. HI0000035 2SN-OY3-2-000003 Issued: 04-05-74 Expires: 01-01-79	01-28-74	02-07-74	--	--	Certified with 7 Other Fac. No Comments
✓ Gaspro, Inc. HI0000299 2SN-OY3-2-000041 Issued: 03-15-74 Expires: 01-01-79	01-28-74	02-07-74	--	--	Certified with 7 Other Fac. No Comments
✓ HI Dept. of Hlth. Samuel Mahelona Memorial Hospital HI0000621 2SN-OY3-2-000090 Issued: 01-11-74 Expires: 11-01-78	10-25-73	*Cannot locate certification letter in application file			
✓ HC and D, Ltd. HI0000132 2SN-OY3-2-000017 Issued: 10-31-73 Expires: 04-30-75	08-30-73	10-16-73		--	Comments rec'd re: expiration c and error in permit
✓ Hawaii Welding Co. HI0000710 2SN-OY3-2-000141 Issued: 03-15-74 Expires: 01-01-79	01-28-74	02-07-74	--	--	Certified with 7 Other Fac. No Comments

Table 2

Certification of EPA Issued Industrial Permits

Page 3

<u>APPLICANT and APPLICATION #/NPDES#</u>	<u>DATE OF PUBLIC NOTICE</u>	<u>DATE OF CERTIFICATION</u>	<u>LATE DATE OF CERTIFICATION</u>	<u>WAIVER</u>	<u>COMMENTS</u>
✓ Hawaiian Tug & Barge HI0000701 2SN-OY3-2-000138 Issued: 12-31-73 Expires: 09-30-78	10-25-73	--	12-12-73	--	Certified with 3 Other Fac. No Comments
✓ Young Brothers (Vehicle Wash) HI0000698 2SN-OY3-2-000137 Issued: 12-31-73 Expires: 09-30-78	10-25-73	--	12-12-73	--	Certified with 3 Other Fac. No Comments
✓ Young Brothers (Livestock) HI000060 2SN-OY3-2-000006 Issued: 12-10-73 Expires: 10-01-75	10-25-73	11-20-73	--	--	Comments quite extensive in length and depth
✓ Hilo Coast Processing Co. Pepeekeo Mill HI0000191 2SN-OY3-2-000025 Issued: 10-21-73 Expires: 04-01-77	05-10-73 *Hearing 06-12-73	10-10-73			Certified with 3 Other Fac. No comments. But rec'd extensive comments 08-28-73
✓ Hilo Coast Processing Co; Papaikou Mill HI0000248 2SN-OY3-2-000248 Issued: 10-21-73 Expires: 04-01-77	Same as Above	Same as Above	Same as Above		Same as Above
Hilo Coast Processing Co. Hakalau Mill HI0000205 09-30-73 to 06-30-74					

<u>APPLICANT and APPLICATION #/NPDES#</u>	<u>DATE OF PUBLIC NOTICE</u>	<u>DATE OF CERTIFICATION</u>	<u>LATE DATE OF CERTIFICATION</u>	<u>WAIVER</u>	<u>COMMENTS</u>
✓ Hilo Coast Processing Co. Wainaku Mill HI0000221 2SN-OY3-2-000031 Issued: 09-30-73 Expires: 06-30-74	05-10-73 *Hearing 06-12-73		← 10-10-73		Certified with 3 other Fac. No Comments, but rec' extensive comments 08-28-73
✓ Kaiser Cement and Gypsum Corporation HI0000540 2SN-OY3-2-000082 Issued: 10-31-73 Expires: 09-01-77	10-01-73	10-09-73	--	--	
✓ Kekaha Sugar Co. HI0000086 2SN-OY3-2-000008 Issued: 11-30-73 Expires: 08-01-77	07-30-73	09-21-73		--	Extensive comments felt limits too strict. Enclosed Zone of Mixing
✓ Kohala Sugar Co. HI0000167 2SN-OY3-2-000021 Issued: 12-31-73 Expires: 12-31-75	10-25-73	11-19-73	--	--	No Comments
✓ Lihue Plantation Co., Ltd Kealia Camp HI0000736 2SN-OY3-2-000143 Issued: 04-30-74 Expires: 01-01-75	02-25-74	04-02-74	--	--	No comments, but telecons with Dennis Lau



Table 2

Certification of EPA Issued Industrial Permits

Page 5

<u>APPLICANT and APPLICATION #/NPDES#</u>	<u>DATE OF PUBLIC NOTICE</u>	<u>DATE OF CERTIFICATION</u>	<u>LATE DATE OF CERTIFICATION</u>	<u>WAIVER</u>	<u>COMMENTS</u>
✓ Lone Star Industries, Inc. HI0000558 2SN-OY3-2-000083 Issued: 10-31-73 Expires: 04-30-75	08-30-73	--	10-16-73	--	Comments rec'd re: unacceptable expir. date which would goe beyond Imple. Action
✓ McBryde Sugar Co. HI0000361 2SN-OY3-2-000052 Issued: 11-30-73 Expires: 08-01-77	07-30-73 *1st Request for Cert. 07-13-73 2nd Request for Cert. 09-07-73		--	--	Rec'd letter on 09-20-73 saying they cannot certif until receipt of further info
✓ Olokele Sugar Co. HI0000116 2SN-OY3-2-000011 Issued: 11-30-73 Expires: 08-01-73	Same as Above		--	--	Same as Above
✓ Phillips Petroleum Co. HI0000663 2SN-OY3-2-000108 Issued: 10-31-73 Expires: 10-20-78	08-30-73	09-26-74	--	--	Certified with 2 Other Fac. No Comments
✓ Pioneer Mill Co. HI0000078 2SN-OY3-2-000007 Issued: 11-30-73 Expires: 08-01-77	08-30-73	--	11-07-73 *09-27-73 rec'd letter withholding cert. until receipt of further info	--	No Comments

<u>APPLICANT and APPLICATION #/NPDES#</u>	<u>DATE OF PUBLIC NOTICE</u>	<u>DATE OF CERTIFICATION</u>	<u>LATE DATE OF CERTIFICATION</u>	<u>WAIVER</u>	<u>COMMENTS</u>
✓ Shell Oil Company (Marketing & Distributing Plant) HI0000582 2SN-OY3-2-000086 Issued: 10-31-73 Expires: 10-20-78	08-30-73	09-26-73	--	--	Certified with 2 OtherFac.. No Comments
✓ Standard Oil of Ca (Hawaiian Refinery) HI0000329 2SN-OY3-2-000047 Issued: 03-15-73 Expires: 03-15-78	--	--	--	--	Looks like permit was issued by HI during Interim Period
✓ T. Davies & Co. Honokaa Mill HI0000256 2SN-OY3-2-000034 Issued: 10-21-73 Expires: 04-01-77	05-10-73 *Hearing 06-12-73	10-10-73		--	Certified with 3 Other Fac. No Comments, but rec' extensive comments on 08-28-74
✓ T. Davies & Co. Laupahoehoe Mill HI0000159 2SN-OY3-2-000019 Issued: 10-21-73 Expires: 04-01-77	Same as Above	Same as Above			Same as Above
Texaco Inc. HI0000671 2SN-OY3-2-000109 Issued: 12-31-73 Expires: 03-01-74	08-30-73	11-19-73			No Comments

Table 2

Certification of EPA Issued Industrial Permits

Page 7

<u>APPLICANT and APPLICATION #/NPDES#</u>	<u>DATE OF PUBLIC NOTICE</u>	<u>DATE OF CERTIFICATION</u>	<u>LATE DATE OF CERTIFICATION</u>	<u>WAIVER</u>	<u>COMMENTS</u>
✓ Waiakea Corporation HI0020231 Issued: 05-24-74 Expires: 02-28-79	02-25-74	--	05-07-74	--	Certified with 7 Other Fac. No Comments
✓ Waiālua Sugar Co. HI0000230 2SN-OY3-2-000032 Issued: 11-20-73 Expires: 08-01-77	08-30-73	--	--	--	Rec'd letter on 09-26-73 saying cert. until further info rec'd
• Wailuku Sugar HI0000108 2SN-OY3-2-000010 Issued: 11-30-73 Expires: 03-01-77	Same as Above	--	--	--	Same as Above
✓ University of HI Kewalo Marine Lab HI0000345 2SN-OY3-2-000049 Issued: 10-31-73 Expires: 10-01-78	10-01-73	10-09-73	--	--	Certified with 1 Other Fac. No Comments
✓ Hawaiian Electric Co. Kahe Facility HI0000019 2SN-OY3-2-000001 Issued: 06-02-74 Expires: 06-01-78	12-07-74 *01-08-74				*Sent letter of Waiver 04-19-74